



August 2, 2013

By FedEx overnight delivery Tracking No. 8025 3400 9210

Air and Radiation Division EPA Region 5 77 West Jackson Blvd. (AE-17J) Chicago, IL 60604 Attn: Compliance Tracker Tracking No. 8025 3400 9243

Office of Regional Counsel EPA Region 5 77 West Jackson Blvd. (C-14J) Chicago, IL 60604

RE:

United States v. SABIC Innovative Plastics US LLC, et al., No. 3:12-cv-76

Burkville, Alabama Plant Certification of Compliance

Pursuant to Paragraph 50 of Subsection L: Certification of Compliance of the Consent Decree in the above-referenced matter, SABIC Innovative Plastics US LLC (SABIC) is submitting the one-time Certification of Compliance for its Burkville, Alabama plant. This certification must be submitted within 180 days after the initial LDAR Audit Completion Date (which was February 5, 2012), which makes August 4, 2013 the deadline to submit this certification. Therefore, this submission is timely.

Paragraph 50 Certification:

SABIC certifies that, to the best knowledge and belief of the undersigned formed after reasonable inquiry: (i) the Covered Process Units are in compliance with all applicable LDAR regulations and the Consent Decree's ELP; (ii) SABIC has completed all corrective actions pursuant to a CAP; and (iii) all equipment at the Covered Process Units that is regulated under LDAR has been identified and included in the Covered Process Units' LDAR programs.

Paragraph 67 Certification:

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that this document and its attachments were prepared either by me personally or under my direction or supervision in a manner designed to ensure that qualified and knowledgeable personnel properly gather and present the information contained therein. I further certify, based on my personal knowledge or on my inquiry of those individuals immediately responsible for obtaining the information, that the information is true, accurate, and complete.

John A. Curvey, Site General Manager

cc (by email): Loukeris.constantinos@epa.gov

Daugavietis.andre@epa.gov